Robbins Geller Rudman & Dowd LLP

Chicago	Melville	Nashville	San Diego	Wilmington
Boca Raton	Manhattan	Philadelphia	San Francisco	Washington, D.C.

November 1, 2023

<u>VIA ECF</u>

The Honorable Judge Margo K. Brodie
United States District Court
  for the Eastern District of New York
225 Cadman Plaza East
Courtroom 6F
Brooklyn, NY 11201

Magistrate Judge Vera M. Scanlon
United States District Court
  for the Eastern District of New York
225 Cadman Plaza East
Room 1214 South
Brooklyn, NY 11201

Re: *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*, No. 1:05-MD-1720 (MKB)(VMS)

Dear Judges Brodie and Scanlon:

Rule 23(b)(3) Class Counsel ("Class Counsel") attach as Exhibit A a funding request from Epiq regarding 3 months of invoices totaling $1,234,505.99. The invoices principally relate to preparing for the December 1, 2023 Claim Form Mailing, staffing the toll-free number and email inbox to respond to class member questions, maintaining and updating the settlement website, data preparation and hosting efforts, and periodic reporting for counsel.

In addition, a clerical error was noted in the "Funding Request for Paper Stock, Media Notice, and Claim Form Mailing" filed with the Court on September 19, 2023. While funding for $15,284,000.00 was granted, Epiq's request inadvertently omitted the $2,000,000.00 deposit in the total requested funding amount. Collectively, the September 19, 2023 request should have totaled $17,284,000.00. Class Counsel request that the Court approve the net funding request of $1,234,505.99, plus the $2,000,000.00 (deposit) for a total of $3,234,505.99 as detailed in the attached. The requested funds should be paid from the Class Settlement Cash Escrow Account.

Respectfully submitted,

/s/ K. Craig Wildfang	/s/ H. Laddie Montague, Jr.	/s/ Alexandra S. Bernay
K. Craig Wildfang	H. Laddie Montague, Jr.	Patrick J. Coughlin
Thomas J. Undlin	Merrill G. Davidoff	Alexandra S. Bernay
Robins Kaplan LLP	**Berger Montague PC**	**Robbins Geller Rudman & Dowd LLP**

Exhibit A

cc: All Counsel via ECF

655 West Broadway, Suite 1900   San Diego, CA 92101   Tel 619-231-1058   Fax 619-231-7423   rgrdlaw.com